## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA COLUMBIA DIVISION

ANTHONY LAWRENCE DASH,	
Plaintiff, )	Civil Action No.: 3-10-CV-01036-JFA
v. )	
)	DEFENDANT WORLD WRESTLING
FLOYD MAYWEATHER, JR.,	ENTERTAINMENT, INC.'S MOTION
an individual; MAYWEATHER )	FOR SUMMARY JUDGMENT
<b>PROMOTIONS; MAYWEATHER</b> )	REGARDING PLAINTIFF'S
PROMOTIONS, LLC; PHILTHY RICH )	ENTITLEMENT TO COPYRIGHT
RECORDS, INC.; and WORLD	DAMAGES
WRESTLING ENTERTAINMENT, INC.;	
)	
<b>Defendants.</b>	

## **MOTION FOR SUMMARY JUDGMENT**

Pursuant to Rule 56(a) of the Federal Rules of Civil Procedure, Defendant World Wrestling Entertainment, Inc. ("WWE") hereby respectfully moves for summary judgment regarding Plaintiff Anthony Dash's entitlement to copyright damages for the reasons set forth in WWE's accompanying Memorandum in Support of WWE's Motion for Summary Judgment Regarding Plaintiff's Entitlement to Copyright Damages.

January 17, 2012

s/ Beverly A. Carroll
Federal ID No. 0062
K&L GATES LLP
Hearst Tower, 47th Floor
214 N. Tryon Street
Charlotte, North Carolina 28202
bev.carroll@klgates.com
(704) 331-7586
(704) 353-3286 (fax)

Jerry S. McDevitt (pro hac vice) Curtis B. Krasik (pro hac vice) K&L GATES LLP K&L Gates Center 210 Sixth Avenue Pittsburgh, Pennsylvania 15222-2613 (412) 355-8608

ATTORNEYS FOR DEFENDANT WORLD WRESTLING ENTERTAINMENT, INC.

## **CERTIFICATE OF SERVICE**

I hereby certify that on January 17, 2012, I electronically filed the foregoing *Defendant World Wrestling Entertainment, Inc.'s Motion for Summary Judgment Regarding Plaintiff's Entitlement to Copyright Damages* with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Thomas L. Moses, Esq. MONAHAN & MOSES, LLC

Email: tom.moses@momolaw.com

John G. Felder, Jr.
William A. McKinnon
Jordan Christopher Calloway
MCGOWAN HOOD & FELDER
Email: jfelder@mcgowanhood.com

Email: bmckinnon@mcgowanhood.com Email: jcalloway@mcgowanhood.com

Attorneys for Plaintiff

P. Benjamin Zuckerman AKERMAN SENTERFITT

Email: ben.zuckerman@akerman.com

Mark G. Tratos Bethany Rabe Franklin Christopher Austin Tyler R Andrews GREENBERG TRAURIG

Email: <a href="mailto:tratosm@gtlaw.com">tratosm@gtlaw.com</a>
Email: <a href="mailto:rabeb@gtlaw.com">rabeb@gtlaw.com</a>
Email: <a href="mailto:austinc@gtlaw.com">austinc@gtlaw.com</a>
Email: <a href="mailto:andrewst@gtlaw.com">andrewst@gtlaw.com</a>

Attorneys for Defendants Floyd Mayweather, Mayweather Promotions, Mayweather Promotions LLC and Philthy Rich Records, Inc.

s/ Beverly A. Carroll

Beverly A. Carroll Federal ID No. 0062 K&L GATES LLP Hearst Tower, 47th Floor 214 N. Tryon Street Charlotte, North Carolina 28202 bev.carroll@klgates.com (704) 331-7586 (704) 353-3286 (fax)

ATTORNEYS FOR DEFENDANT WORLD WRESTLING ENTERTAINMENT, INC.